

**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

Plaintiff;

v.

COMMONWEALTH OF PUERTO RICO,  
ET AL.,

Defendants.

No. 12-cv-2039 (GAG)

**MOTION FOR BRIEF EXTENSION OF TIME TO SUBMIT  
THE UNITED STATES' POSITION ON DISQUALIFICATION**

TO THE HONORABLE COURT:

COMES NOW, Plaintiff, the United States of America, by and through the undersigned counsel, and respectfully requests a brief extension of time until May 31, 2019, to complete its assessment of any disqualification issues that arise from the former Monitor's public statements concerning alleged unethical conduct and conflicts of interest involving the Court. Order, Docket 1224 (May 23, 2019). For cause, the United States alleges and states as follows:

1. On May 23, 2019, the Court issued an Order instructing the United States to "state its position as to the disqualification of both the undersigned and McConnell Valdes" by May 29, 2019. *Id.* at 1. In its Order, the Court noted that "because the purported conflict only became an issue recently and extrajudicially, the United States never has had the opportunity to express itself for the record." *Id.*

2. The United States has worked diligently to assess the former Monitor's allegations to determine whether they support any grounds for disqualification under the applicable law and code of judicial conduct. The undersigned has also consulted with its Professional Responsibility Advisory Office, given the sensitivity of the issues.

3. The United States requires a brief extension of time, until May 31, 2019, to complete its assessment. The two-day extension would give the United States five business days to formulate its position and submit its brief on any potential disqualification issues.

4. Because the Court instructed the United States to submit its position on disqualification in restricted mode for viewing only by the United States and counsel for Defendants, the United States will also file the instant motion with the same viewing restrictions.

WHEREFORE, the United States respectfully requests that this Court grant a brief two-day extension until May 31, 2019, to submit its position on disqualification in compliance with the Court's May 23 Order, Docket No. 1224.

WE HEREBY CERTIFY that on today's date, we filed the foregoing pleading electronically through the CM/ECF system, which caused the selected parties on the service list to be served by electronic means.

Respectfully submitted, this 29th day of May, 2019,

**STEVEN H. ROSENBAUM**  
Chief, Special Litigation Section  
Civil Rights Division

**TIMOTHY D. MYGATT**  
Deputy Chief

s/Luis E. Saucedo  
**LUIS E. SAUCEDO** (G01613)  
Counselor to the Chief  
**JORGE CASTILLO** (G02912)  
Trial Attorney  
U.S. Department of Justice  
Civil Rights Division  
Special Litigation Section  
950 Pennsylvania Avenue, NW  
Washington, DC 20530  
Telephone: (202) 598-0482  
Fax: (202) 514-4883

[luis.e.saucedo@usdoj.gov](mailto:luis.e.saucedo@usdoj.gov)  
[jorge.castillo@usdoj.gov](mailto:jorge.castillo@usdoj.gov)

Attorneys for Plaintiff